

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: AVANDIA MARKETING, SALES )  
PRACTICES AND PRODUCTS LIABILITY )  
LITIGATION )  
\_\_\_\_\_)  
\_\_\_\_\_)  
THIS DOCUMENT APPLIES TO ALL ACTIONS )  
\_\_\_\_\_)  
\_\_\_\_\_)

MDL NO. 1871  
07-MD-01871-CMR

**APPLICATION FOR APPOINTMENT OF A. DANIEL WOSKA  
AND TARA TABATABAIE TO PLAINTIFFS' STEERING COMMITTEE**

COME NOW, A. Daniel Woska and Tara Tabatabaie of A. Daniel Woska & Associates, P.C., make application to this Honorable Court pursuant to Pretrial Order No. 103 in this action for Appointment to the Plaintiffs' Steering Committee in the Avandia Litigation. In submitting this Application to the Court, Applicants have been actively involved in this MDL litigation from inception; Applicants have filed hundreds of cases in the state and federal MDL's; the Applicants have Avandia cases they plan to present for trial before this Court, and Tara Tabatabaie, who also has a Ph.D in chemistry, has worked on the Avandia Science Committee since 2007.

Applicants are all familiar with the manual for Multi-District Litigation and Procedure. Applicants currently serve on several class action Plaintiff Steering Committees. Applicant, A. Daniel Woska, has also presented arguments before the MDL panel and has been litigating since 1978 and is familiar with all aspects of presenting claims like these to juries and judges.

Applicants would also ask to be considered for appointment to the Trial Team Committee, to work with and assist the Plaintiffs' Steering Committee Trial Team in the completion of preparation and trial of the Avandia cases present set for trial.

Thus, Applicants respectfully request this Honorable Court to consider and appoint Applicants to a position on the Plaintiffs' Steering Committee for Avandia Litigation and also to be approved as a member of the Avandia Plaintiffs' Steering Committee Trial Team. Applicants will remain committed to this litigation and assure the Court that they will continue to work diligently tenaciously and tirelessly if appointed.

Respectfully submitted,

**A. DANIEL WOSKA & ASSOCIATES, P.C.**

/s/ A. Daniel Woska

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 15<sup>th</sup> day of July, 2010, the foregoing Application for Appointment to Plaintiff's Steering Committee was electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all counsel of records of the CM/ECF System, via United States First Class Mail.

/s/ A. Daniel Woska  
A. Daniel Woska